

AB:ADR/VJM/JOE/EWS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 922(g)(1))

DARRELL ROBINSON,

Case No. 22-MJ-849

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH NICOSIA, being duly sworn, deposes and states that he is a Detective with the New York City Police Department, and a task force officer duly appointed according to law and acting as such.

On or about August 8, 2022, within the Eastern District of New York and elsewhere, the defendant DARRELL ROBINSON, knowing that he had been previously convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting interstate or foreign commerce a firearm, to wit: (a) a Smith & Wesson .380 caliber pistol bearing serial number NJZ0007; (b) a Taurus 9 millimeter pistol bearing serial number TKP09139; (c) a Bersa .380 caliber pistol bearing serial number 597527; (d) a Springfield Armory 9 millimeter pistol bearing serial number AT185286; (e) a Smith & Wesson 9 millimeter pistol bearing serial number FBN9377; and (f) a Smith & Wesson .22 caliber rifle bearing serial number LAC4435.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Detective with the New York City Police Department ("NYPD") and have been involved in the investigation of numerous cases involving the recovery of firearms and ammunition. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. Through its investigation, law enforcement learned that on or about August 8, 2022, ROBINSON would be traveling in a vehicle to the Willets Point-section of Queens, New York, transporting firearms and cash to a firearms sale. Acting pursuant to a judicially-authorized search warrant, law enforcement located, stopped, and searched ROBINSON's vehicle, which contained a bag filled with seven firearms—namely, (a) a Smith & Wesson .380 caliber pistol bearing serial number NJZ0007; (b) a Taurus 9 millimeter pistol bearing serial number TKP09139; (c) a Bersa .380 caliber pistol bearing serial number 597527; (d) a Springfield Armory 9 millimeter pistol bearing serial number AT185286; (e) a Smith & Wesson 9 millimeter pistol bearing serial number FBN9377; and (f) a Smith & Wesson .22 caliber rifle bearing serial number LAC4435.

3. I have reviewed the defendant's criminal history, which revealed, among other felony convictions, that on or about November 17, 2011, DARRELL ROBINSON was

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

convicted of burglary in the second degree, a felony punishable by up to ten years imprisonment pursuant to South Carolina Code of Laws Section 16-11-312(C)(1), and grand larceny, a felony offense punishable by up two years imprisonment, pursuant to South Carolina Code of Laws Section 16-13-30(B)(1). On or about May 15, 2014, ROBINSON was convicted of burglary in the second degree, a felony punishable by up to ten years imprisonment pursuant to South Carolina Code of Laws Section 16-11-311(C)(1), and grand larceny, a felony offense punishable by up two years imprisonment, pursuant to South Carolina Code of Laws Section 16-13-30(B)(1). Finally, on or about March 1, 2022, ROBINSON was convicted of burglary in the second degree, a felony punishable by up to fifteen years imprisonment pursuant to South Carolina Code of Laws Section 16-11-312(C)(2), and grand larceny, a felony offense punishable by up two years imprisonment, pursuant to South Carolina Code of Laws Section 16-13-30(B)(1).

4. I have conferred with a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), who has informed me, in substance and in part, that the firearms recovered were manufactured outside the state of New York.

WHEREFORE, your deponent respectfully requests that the defendant  
DARRELL ROBINSON be dealt with according to law.

/s/ Joseph Nicosia  
JOSEPH NICOSIA  
Detective  
New York City Police Department

Sworn to before me by telephone  
this 9th day of August, 2022

Taryn A. Merkl  
THE HONORABLE TARYN A. MERKL  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK